

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN THE MATTER OF:) IN CHAPTER 7
)
 PACKAGING ADVANTAGE, INC.,) **16-24295**
)
 Debtor(s).)

NOTICE

TO: Office of the United States Trustee – Service through CM/ECF
Mr. Robert Rotman– Service through CM/ECF
Mr. John Sheldon – Service through CM/ECF
Mr. Elliot Wizcer – Service through CM/ECF
See Attached Service List – Service through US Mail

PLEASE TAKE NOTICE that on the 28th day of September, 2018 at the hour of 11:00 a.m. or as soon thereafter as counsel may be heard, I shall appear before the Honorable JANET S. BAER, Bankruptcy Judge, at the Kane County Courthouse, 100 South Third Street, Courtroom No. 240, Geneva, Illinois, or before such other Judge as may be sitting in her place and stead, and then and there present the attached Application, at which time and place you may appear, if you so see fit.

/s/GINA B. KROL
GINA B. KROL
105 W. Madison St., Suite 1100
Chicago, IL 60602
312/368-0300

STATE OF ILLINOIS)
) SS
COUNTY OF COOK)

GINA B. KROL, being first duly sworn on oath, deposes and states that she served a copy of the foregoing Notice together with a copy of the Application attached hereto on the persons shown above, via CM/ECF System and/or US Mail, this 29th day of August, 2018.

/s/ GINA B. KROL

Label Matrix for local noticing
0752-1
Case 16-24295
Northern District of Illinois
Chicago
Wed Aug 29 14:23:59 CDT 2018

Packaging Advantage, Inc.
470 Fenton Ln.
West Chicago, IL 60185-2667

Source One Staffing, Inc.
136 W. Washington St.
West Chicago, IL 60185-2803

U.S. Bankruptcy Court
Eastern Division
219 S Dearborn
7th Floor
Chicago, IL 60604-1702

5th/3rd Mortgage Co.
% Codilis & Associates
15W0300 N. Frontage Rd.
Burr Ridge, IL 60527-6921

Bank of America
% Phillips & Cohen Associates
1002 Justison St.
Wilmington, DE 19801-5148

Chase Bank USA
% The Creditors Rights & Bankruptcy
1002 Justin St.
Wilmington, DE 19801-5148

Christina Scott
42W283 Jens Jensen Ln
Saint Charles, IL 60175-8205

Christine Scott
42W 283 Jens Jensen Ln
St Charles, IL 60175-8205

Christine Scott
42W283 Jens Jensen Ln
Saint Charles, IL 60175-8205

Cynthia Sedan
21260 Country Squire Ln
Dubuque, IA 52001-8000

Cynthia Sedan
PO Box 6565
Galena, IL 61036-6565

Davis McGrath, LLC
125 S Wacker Dr Ste 1380
Chicago, IL 60606-4402

Dorothy Curtis
PO Box 3074
Saint Charles, IL 60174-9098

Dorothy Curts
1011 Indiana Ave
Saint Charles, IL 60174-3141

Estate of Richard Swanson
% John Biallas, Atty. at Law
3N918 Sunrise Ln
Saint Charles, IL 60174-5081

First National Bank of Omaha
Attn: Rosemary More
PO Box 3773
Omaha, NE 68103-0773

Hector Vega
1217 Kings Ct Apt 22
West Chicago, IL 60185-4332

Hickory Ridge Townhouse Associates
% Paul A. Kreig, Atty at Law
226 W. Judd St.
Woodstock, IL 60098-3158

Jeffrey S Harris
1701 S First Ave
#202
Maywood IL 60153-2400

Nancy Rasmusen
21 Butternut Ln
Galena, IL 61036-9556

Nancy Rasmussen
21 Butternut Ln
Galena, IL 61036-9556

Northwestern Medical Occupational Health
25 N Winfield Rd
Winfield, IL 60190-1222

Pearl A Marziani
d/b/a Marziani Enterprises
c/o Gini S Marziani
125 S Wacker Drive
Chicago IL 60606-4424

Pearl Marziani d/b/a Marziani Enterprise
100 Hahndorf Rd Ste 101
West Chicago, IL 60185-5175

Richard Swanson
7012 County Road 6
Florence, AL 35633-4728

Rotman & Rotman LTD
134 N La Salle St Ste 200
Chicago, IL 60602-1056

The Mayo Clinic
200 1st St. SW
Rochester, MN 55905-0001

The Private Bank & Trust Co.
% Lebow, Malecki & Tasch, LLC
903 Commence Dr. Ste. 160
Oak Brook, IL 60523-8830

Wiczner & Sheldon
500 Skokie Blvd Ste 325
Northbrook, IL 60062-2887

Gina B Krol
Cohen & Krol
105 West Madison St Ste 1100
Chicago, IL 60602-4600

Patrick S Layng
Office of the U.S. Trustee, Region 11
219 S Dearborn St
Room 873
Chicago, IL 60604-2027

Robert D. Rotman
Rotman & Rotman, Ltd.
134 N LaSalle St. Ste 200
Chicago, IL 60602-1056

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)Packaging Advantage Inc
470 Fenton Ln
West Chicago, IL 60185-2667

(d)Source One Staffing, Inc.
136 W Washington St
West Chicago, IL 60185-2803

(u)Alan D Lasko
Alan D. Lasko & Associates, P.C.

(u)Christine Scott

(u)Cynthia Sedan

(u)Dorothy Curts

(u)Nancy Rasmussen

(u)Pearl Marziani

(u)Richard Swanson

End of Label Matrix
Mailable recipients 32
Bypassed recipients 9
Total 41

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN THE MATTER OF:)	IN CHAPTER 7
)	
PACKAGING ADVANTAGE, INC.,)	No. 16-24295
)	
Debtor(s).)	

TRUSTEE'S APPLICATION TO SELL CAUSE OF ACTION

TO THE HONORABLE **JANET S. BAER**
BANKRUPTCY JUDGE

Now comes **GINA B. KROL**, Trustee herein, and respectfully represents unto this Honorable Court as follows:

1. She is the duly appointed, qualified and acting Chapter 7 Trustee in the above-entitled proceeding.

2. Prior to the filing the Debtor and Source One were engaged in litigation. In that litigation, Source One alleged that the Debtor's principals, Dorothy Curtis and Nancy Rasmussen breached their fiduciary duties and made unlawful distributions to themselves and or insiders.

6. Source One has urged the Trustee to take on that litigation in an effort to recover additional funds for the creditors of this Estate. The Trustee does not believe it's in the best interests of the Estate to expend Estate funds to pursue this litigation.

7. The Trustee has negotiated a sale of that cause of action with Source One where Source One would pay the Estate the sum of \$7,000.00 to purchase all of the Estate's interest in that cause of action and reduce its duly filed general unsecured Claim #6 from \$639,851.96 to \$468,000.00. The reduction in the amount of the claim would result in a greater monetary distribution to other creditors of this Estate.

8. The Trustee believes that the sale of this litigation to Source One results in a benefit to the Estate without the risk of expense or loss and that acceptance of this offer is in the best interests of creditors herein.

9. The Trustee recommends the acceptance of the \$7,000.00 from Source One. The Trustee makes no representations or warranties of any kind with respect to value or validity of this cause of action.

10. If approved the sale will result in a meaningful dividend to creditors of this Estate.

WHEREFORE, GINA B. KROL, Trustee herein, prays for the entry of an Order authorizing the Trustee to sell the Debtor's right, title and interest in litigation against Dorothy Curtis and Nancy Rasmussen for alleged breach of fiduciary duties and improper distributions to Source One for the sum of \$7,000.00 , without representations or warranties of any kind as to value or validity of these claims; and as additional consideration, Source One's general unsecured Proof of Claim #6 will be reduced to \$468,000.00 and for such other and further relief as the Court shall deem proper.

GINA B. KROL, Trustee

GINA B. KROL
COHEN & KROL
105 W. Madison St., Suite 1100
Chicago, IL 60602
312/368-0300

BY: /s/ Gina B. Krol
One of Attorneys for Trustee